

BARRETT DAFFIN FRAPPIER TURNER & ENGEL, LLP
4004 BELT LINE ROAD, SUITE 100
ADDISON, TX 75001
(972) 386-5040

BDFTE# 10382430

Attorney for ROCKET MORTGAGE, LLC F/K/A QUICKEN LOANS, LLC

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:	§ CASE NO. 25-51165-jwc
	§
Gregory Lee Trask,	§ CHAPTER 13
Debtor(s)	§ CONTESTED MATTER

OBJECTION TO CONFIRMATION

COMES NOW ROCKET MORTGAGE, LLC F/K/A QUICKEN LOANS, LLC
(hereinafter “Creditor”), a secured creditor holding a Security Deed on Real Property commonly
known as 4555 YELLOW CREEK ROAD, BALL GROUND, GEORGIA 30107, and for the
reasons stated below files its “Objection to Confirmation:”

1.

Creditor has not yet filed its Proof of Claim but anticipates filing a claim with an unpaid principal balance of \$559,518.99, estimated arrears in the amount of \$20,701.36, and ongoing monthly mortgage payments in the amount of \$3,753.63. Creditor is in the process of preparing its Proof of Claim. Creditor asserts this Objection to preserve its rights and to assist in the efficient administration of the confirmation process.

2.

Debtor's Chapter 13 Plan proposes to pay \$0.00 over 60 months for the pre-petition arrears. Debtor has failed to satisfy Creditor's Proof of Claim pursuant to the terms of the Note

and Security Deed by failing to provide for the payment of the arrearage claim in the Chapter 13 Plan. The Plan does not provide for payment of Creditor's allowed secured claim.

3.

The plan fails to timely cure the default reflected in the Proof of Claim as required in 11 U.S.C. § 1322 (b)(5).

4.

The plan is not feasible. Based on debtor's schedules, the Debtor will not be able to make all payments under the Plan and to comply with the Plan. Therefore, confirmation should be denied as not meeting the requirements of 11 U.S.C. §1325(a).

5.

Creditor reserves the right to amend and/or supplement its Objection at or prior to any hearing on confirmation of the Plan.

WHEREFORE, Creditor prays for reasonable attorney's fees and for such other and further relief as is just and equitable.

Respectfully submitted,

BARRETT DAFFIN FRAPPIER
TURNER & ENGEL, LLP

BY: /s/ John Callison
JOHN CALLISON
GA NO. 167972
4004 BELT LINE ROAD SUITE 100
ADDISON, TX 75001
Telephone: (972) 386-5040
E-mail: GA.ND.ECF@BDFGROUP.COM
ATTORNEY FOR CREDITOR

CERTIFICATE OF SERVICE

I hereby certify that on February 19, 2025, a true and correct copy of the Objection to Confirmation was served via electronic means as listed on the Court's ECF noticing system or by regular first class mail to the parties listed on the attached list.

Respectfully submitted,

BARRETT DAFFIN FRAPPIER
TURNER & ENGEL, LLP

BY: /s/ John Callison
JOHN CALLISON
GA NO. 167972
4004 BELT LINE ROAD SUITE 100
ADDISON, TX 75001
Telephone: (972) 386-5040
E-mail: GA.ND.ECF@BDFGROUP.COM
ATTORNEY FOR CREDITOR

BY ELECTRONIC NOTICE OR REGULAR FIRST CLASS MAIL:

DEBTORS:

Gregory Lee Trask
4555 Yellow Creek Road
Ball Ground, GA 30107

DEBTORS' ATTORNEY:

Jeffrey M. Heller
J. M. Heller, Attorney At Law, P.C.
291 Jarvis Street
Canton, GA 30114

TRUSTEE:

Nancy J. Whaley
Standing Ch. 13 Trustee
Suite 120, Truist Plaza Garden Offices
303 Peachtree Center Avenue
Atlanta, GA 30303